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U.S. BANKRUPTCY COURT
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*Attorney for Gregory J. Walch and Shauna M. Walch,
Trustees of the Gregory J. and Shauna M. Walch
Family Trust*

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

Case No.: 06-10725-LBR
Chapter 11

USA COMMERCIAL MORTGAGE
COMPANY,

Debtor.

**GREGORY J. WALCH'S MOTION FOR
PERMISSION TO FILE IN PAPER
FORMAT DUE TO EXEMPTION OR
EXCEPTIONAL CIRCUMSTANCES**

Date of Hearing: N/A
Time of Hearing: N/A

Pursuant to Administrative Order 04-3 (the "Order"), movant Gregory J. Walch, Esq., hereby requests permission to file documents in traditional paper format on the grounds that:

****Movant is not a "Regular Filer" as defined in the Order; and**

****Exceptional circumstances exist which prevent filing by electronic means.**

1. Document

The documents which the movant seeks permission to file in paper format are:

A. JOINDER IN OPPOSITION TO DEBTOR'S MOTION FOR ORDER GRANTING DEBTOR ADDITIONAL TIME TO FILE ITS STATEMENTS AND SCHEDULES;

B. PARTIAL OPPOSITION TO "DEBTORS' PROPOSED CASH MANAGEMENT PROCEDURES AND INTERIM USE OF CASH IN ACCORDANCE WITH PROPOSED CASH BUDGET."

2. Exceptional Circumstances

If permission to file in paper format is sought on the basis of exceptional circumstances,

1 the movant states the following as grounds for the Motion:

2 (a) Internet service problems - N/A

3 (b) Other grounds exist for the Exceptional Circumstances Motion. Each of Debtor's
4 motions opposed by movant are being heard on a shortened-time basis May 3, 2006. Movant has
5 not had time to engage counsel or otherwise receive the necessary e-filing training in time for the
6 hearing. Movant anticipates engaging counsel shortly after the May 3 hearings, or otherwise will
7 fulfill the e-filing training requirements to continue representing the Trust.

8 (c) Movant has filed a prior Exceptional Circumstances Motion

9 (i) Number of prior motion(s): 0

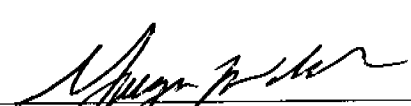
10 (ii, iii, and iv) N/A

11 3. Movant's declaration supporting this Motion is attached pursuant to Section 3(b)(i) of the
12 Order.

13 4. Movant hereby also submits a proposed order pursuant to the Order.

14 Based upon the foregoing, movant requests that the Court grant the Motion.

15 Dated this 1st day of May, 2006.

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25 *Attorney for Gregory J. Walch and Shauna M.*
26 *Walch, Trustees of the Gregory J. and Shauna*
27 *M. Walch Family Trust*
28

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA COMMERCIAL MORTGAGE
COMPANY,

Debtor.

Case No.: 06-10725-LBR
Chapter 11

**DECLARATION OF GREGORY J.
WALCH IN SUPPORT OF MOTION FOR
PERMISSION TO FILE IN PAPER
FORMAT DUE TO EXEMPTION OR
EXCEPTIONAL CIRCUMSTANCES**

Date of Hearing: N/A
Time of Hearing: N/A

1. I am an attorney licensed to practice law in the State of Nevada and am a co-trustee of the Gregory J. and Shauna M. Walch Family Trust ("the Trust"). I am submitting this declaration in support of my MOTION FOR PERMISSION TO FILE IN PAPER FORMAT DUE TO EXEMPTION OR EXCEPTIONAL CIRCUMSTANCES, and make this declaration based upon my personal knowledge.

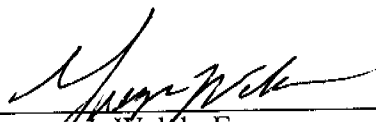
2. I have not made any filings with this court after 2002 and therefore am not a "Regular Filer" to which the e-filing rules apply.

3. Debtor has filed numerous motions that will be heard on a shortened time basis on May 3, 2006, and I have not had time to make arrangements to file electronically. I anticipate either engaging counsel with e-filing capability or taking the e-filing training shortly after the May 3 hearings scheduled for this case.

4. I declare under penalty of perjury under the laws of the United States of America that

the foregoing is true and correct.

Dated this 1st day of May, 2006.



Gregory J. Walch, Esq.